

EXHIBIT C

Donald M. Sitton

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: METHYL TERTIARY)	MASTER FILE
BUTYL ETHER ("MTBE"))	NO. 1:00-1898
PRODUCTS LIABILITY)	M21-88
LITIGATION)	MDL 1358 (SAS)
)	
This Document Relates to:)
)	
COMMONWEALTH OF PUERTO)	
RICO, ET AL.)	
PLAINTIFF,)	CASE NO. 07-CIV-10470
)	(SAS)
VS.)	
)	
SHELL OIL CO., ET AL.,)	
DEFENDANTS.)	
)	

DEPOSITION OF
DONALD M. SITTON
SEPTEMBER 5, 2013
VOLUME 1

Called as a witness by counsel for the Plaintiffs, taken before Dorothy A. Rull, CSR, CRR, a Certified Shorthand Reporter and Notary Public in and for the State of Texas, on the 5th day of September, 2013, from 9:04 a.m. to 12:34 p.m., at the law offices of Norton Rose Fulbright, 1301 McKinney, Suite 5100, Houston, Texas 77010, pursuant to Notice and the Federal Rules of Civil Procedure.

Donald M. Sitton

Page 26

1 Q. Well -- okay. Well, let me just go
2 through a couple more.

3 Mixed xylenes. Was that something
4 that was brought into the plant from off island or
5 was that a product that you manufactured at the
6 chemical plant, Core?

7 A. Both. We could -- if we could purchase
8 mixed xylenes at a good price, we could -- we could
9 purchase it. But in the conversion of naphtha, you
10 also produced mixed xylenes.

11 Q. MTBE. It would be a correct statement,
12 I -- I believe, that the Core facility did not
13 manufacture its own MTBE?

14 A. That's correct.

15 Q. So the purchase of MTBE from whatever
16 source, was that a function of anybody at the Core
17 facility?

18 A. Not that I recall.

19 Q. So, again, that would be Bartlesville?

20 A. I think Bartlesville had more to do with
21 purchasing.

22 Q. Now, would it be fair to say that you
23 were the number 2 guy?

24 A. Yes.

Donald M. Sitton

Page 40

1 Q. And then Bartlesville arranged to have
2 that product shipped --

3 A. Correct.

4 Q. -- to wherever the eventual purchaser --

5 A. Correct.

6 Q. -- was?

7 MS. FARLEY: Objection. Form.

8 A. Correct.

9 BY MR. DEMA:

10 Q. Now, the Core facility also had a
11 loading rack; right?

12 A. Correct.

13 Q. And were you in charge of -- or someone
14 below you in charge of maintaining the loading rack?

15 A. We -- my maintenance department would
16 maintain the loading rack.

17 Q. And how did you know what trucks were
18 going to come up with lift tickets to the loading
19 rack?

20 A. I didn't.

21 Q. Who did?

22 A. Mr. Sola.

23 Q. Do you know if Mr. Alberto Sola is alive
24 today?